

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>IN RE:</b>	: <b>CASE NO: 13-07128-MFH</b>
	: <b>CHAPTER: 7</b>
<b>JIMMY D. STEEN,</b>	:
<b>Debtor.</b>	:
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<b>MICHAEL GIGANDET,</b>	:
<b>Movant,</b>	: <b>CONTESTED MATTER</b>
	:
<b>vs.</b>	:
	:
<b>BANK OF AMERICA, N.A.,</b>	:
<b>Respondent.</b>	:

**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: March 21, 2014**  
**IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: April 22, 2014**  
**at 9:00 a.m., Courtroom 3, Second Floor, Customs House, 701 Broadway, Nashville, TN 37203.**

**RESPONSE TO TRUSTEE'S MOTION TO SELL PROPERTY**

**COMES NOW**, Bank of America, N.A., for itself, its successor and/or assigns (hereinafter collectively referred to as "Respondent"), and responds to the Trustee's Motion to Sell Property filed on February 28, 2014 with respect to the survivorship interest in real property located at 143 Huntington Place, Hendersonville, TN 37075. Respondent holds a first priority lien on this real property. Respondent does not object to the sale, provided that the sale is subject to Respondent's lien and buyer's interest in the property is subordinate to and subject to Respondent's secured interest.

WHEREFORE, Respondent, for itself, its successors and/or assigns, prays that this Court inquire as to the matters raised herein, enter such orders, and require such further inquiry as may appear appropriate to the Court.

Respectfully submitted,

/s/ Natalie Brown  
Natalie Brown  
TN BPR No. 022452  
Rubin Lublin TN, PLLC

119 S. Main Street, Suite 500  
Memphis, TN 38103  
(877) 813-0992  
nbrown@rubinlublin.com  
Attorney for Respondent

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin TN, PLLC certify that on the 13th day of March, 2014, I caused a copy of the Response to Trustee's Motion to Sell Property to be to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Jimmy D. Steen  
143 Huntington Place  
Hendersonville, TN 37075

Joseph P. Rusnak, Esq.  
Tune Entrekin & White PC  
315 Deaderick Street, Suite 1700  
Nashville, TN 37238-1700

Michael Gigandet, Trustee  
Law Office of Michael Gigandet  
208 Centre Street  
Pleasant View, TN 37146

United States Trustee  
Office of the United States Trustee  
701 Broadway, Suite 318  
Nashville, TN 37203-3966

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on 3/13/14

By: /s/ Natalie Brown  
Natalie Brown  
TN BPR No. 022452  
Rubin Lublin TN, PLLC  
119 S. Main Street, Suite 500  
Memphis, TN 38103  
(877) 813-0992  
nbrown@rubinlublin.com  
Attorney for Respondent